

Buckner, Edwin

From: Buckner, Edwin
Sent: Monday, February 27, 2023 14:52
To: Terry Bobo
Cc: 'Lori Jenkins'; 'deberning esealcohol.com'; Nathanson, Kirsten L.; Marty, Kirk F. (SHB); Kendall Palmer (Kendall.Palmer@Corteva.com)
Subject: Comment Letter to ESE Alcohol regarding QAPP and Sampling Plan
Attachments: 230222 EPA's comments on February 2023 Sampling Plan_ESE Alcohol.pdf; 230222 EPA's comments on February 2023 QAPP_ESE Alcohol.pdf

Importance: High

Mr. Terry Bobo:

The EPA has received and reviewed Respondents' Sampling Plan and Quality Assurance Project Plan for the ESE Alcohol, Inc. Site.

Per paragraph 46(d) of the November 1, 2022, Administrative Order on Consent (AOC), the EPA is disapproving the submitted Sampling Plan and directing Respondents to modify the Sampling Plan in accordance with EPA's comments. Given the deficiencies in the proposed Plan, the EPA has significant comments. In addition, several comments we previously provided to Respondents were not addressed, including the statistical basis for the number and location of samples at each proposed sampling location.

We have explained the basis for our disapproval and compiled comments and questions in the document attached to this message. Per paragraph 47 of the AOC, Respondents have ten (10) days to correct the deficiencies and resubmit the Sampling Plan for approval.

Please contact me if you have any questions.

Edwin G. Buckner, PE
RCRA Section
Chemical Branch, Enforcement and Compliance Assurance Division
EPA Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219
913-551-7621 ><>

